



JUN 23 2011

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



406108

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Agmet Metals
7800 Medusa St.
Oakwood Village, Ohio 44146

Re: Request for Information Pursuant to Section 104(e) of CERCLA regarding Chemetco, facility in Hartford, Madison County, Illinois

Dear Sir or Madam:

This letter seeks your cooperation in providing information and documents relating to the Chemetco facility in Madison County, Illinois (Site). The Site has been listed on the National Priorities List (NPL) under the federal Superfund law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601, *et seq.*, commonly referred to as "CERCLA"). This is because the Site is contaminated with hazardous substances that may present a threat to human health or the environment.

The United States Environmental Protection Agency (EPA or "Agency") is investigating the release, or threat of release, of hazardous substances, pollutants or contaminants at the Site. EPA is seeking information concerning the generation, storage, treatment, transportation, and disposal of hazardous substances that have been, or threaten to be, released from the Site. Currently, EPA is identifying activities, materials, and parties that contributed to contamination at the Site. Ultimately, EPA, or by agreement, responsible parties, will study the effects of these substances on the environment and public health and implement required response actions, as appropriate. EPA believes that you possess information which may assist the Agency in its investigation of the Site. Enclosure 1 provides background and historical information concerning the Site and Enclosure 2 provides a map of the Site.

We make this request under Section 104(e)(2) CERCLA, which gives EPA the authority to assess the threats to human health and the environment posed by contaminated sites and to clean up those sites. Under CERCLA, EPA has information-gathering authority that allows the Agency to require persons and corporations to furnish information and documents. Enclosure 3 is a summary of the Agency's legal authority under CERCLA. Enclosure 4, for your information, is a copy of a sample document produced from EPA's record search at the Chemetco Site, indicating you may have information about materials sent to the Site.

We encourage you to give this matter your immediate attention. Instructions to guide you in the preparation of your response are in Enclosure 5. Definitions of the terms used in this Information Request are provided in Enclosure 6. The Information Request itself is found at Enclosure 7. This request inquires into your company's transfer of materials to both the Hartford Site as well as to warehouses owned or operated by Chemetco. A list of Chemetco warehouses is found at Enclosure 8. You are required under law to provide a complete and truthful response to this Information Request and its questions, as well as to provide all requested documents. We request that you respond to this Request and provide requested documentation within thirty (30) days of your receipt of this letter.

You may consider the information that EPA is requesting confidential. Under CERCLA, you may not withhold information on that basis; but you may ask EPA to treat the information as confidential. To request that the Agency treat your information as confidential, you must follow the procedures outlined in Enclosure 9, including the requirement that you support your claim for confidentiality.

Compliance with this Information Request is mandatory. CERCLA provides that failure to answer the questions fully and truthfully and within the prescribed time frame can result in an enforcement action and penalties. Other statutes provide that the submission of false, fictitious statements, or misrepresentations can result in sanctions. Additionally, EPA has the authority to use the information that it requests in an administrative, civil, or criminal action.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, *et seq.*

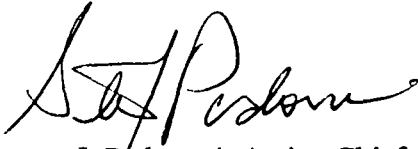
Your response to the information request should be sent back to EPA within thirty (30) days of your receipt of this letter. Your response should be sent to:

Marsha Adams, Enforcement Specialist
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 W. Jackson Blvd., SR-5J
Chicago, IL 60604-3590

If you have any legal questions, please call Thomas Martin, Associate Regional Counsel, at (312) 886-4273. If you have technical questions about this Site, please call Michelle Kerr, Remedial Project Manager at (312) 886-8961. Address all other questions to Marsha Adams, Enforcement Specialist at (312) 353-9484.

We appreciate your assistance and look forward to your prompt response to this Information Request.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. J. Padovani', written in a cursive style.

Steven J. Padovani, Acting Chief
Enforcement and Compliance Assurance Branch

Enclosures

1. Site Background/History
2. Site Map
3. Legal Authority
4. Site Records
5. Instructions
6. Definitions
7. Information Request
8. List of Chemetco Warehouses
9. Confidential Business Information

List of Addressees

Weyerhaeuser Paper Company
510 Maryville College Dr., Ste. 200
St. Louis, MO 63141
314.469.2200

Agmet Metals
7800 Medusa St.
Oakwood Village, OH 44146
440.439.7400

Enclosure 1

SITE BACKGROUND

Chemetco is located approximately two miles south of the Village of Hartford, Madison County, Illinois. Chemetco was a former secondary copper smelter which operated from 1969 to 2001. The Chemetco property occupies more than 230 acres of land, but the former smelter only operated on 41 acres (the smelter site). Chemetco's major function was recycling or secondary processing of copper-bearing scrap and manufacturing residues. This process produced waste byproducts such as slag, zinc oxide (scrubber sludge), and spent refractory brick. On October 31, 2001, Chemetco shut the facility down, and filed for Chapter 7 bankruptcy on November 13, 2001. On December 7, 2001, the Illinois EPA (IEPA) issued an order to seal Chemetco.

In the course of its operations, Chemetco stockpiled approximately 452,254 cubic yards of waste material called "slag" on the northeast corner of the facility property. In addition, IEPA and United States Environmental Protection Agency (EPA) have identified approximately 62,204 cubic yards of zinc oxide (scrubber sludge) located in five separate areas on the Chemetco property, including a 2.5 acre concrete bunker located at the north end of the facility. Elevated levels of cadmium, chromium, copper, lead, mercury, and zinc, among other heavy metals, have been found in the waste materials present at the Site. In addition, elevated levels of cadmium, copper, lead, and zinc, among other heavy metals, have been found in the wetlands and sediments of Long Lake and its tributary, downstream of Chemetco.

The trustee for the estate of Chemetco is now in the course of liquidating the bankrupt company's assets. The facility has been secured with fencing around the perimeter of the 41-acre site. The State of Illinois and EPA have each filed claims in federal court to address contamination on and off the Site, including the lead, cadmium and zinc detected in wetlands and Long Lake downstream of Chemetco. To better enable use of governmental authority under CERCLA, the federal law that addresses hazardous substances, the State proposed the Site for the National Priorities List (NPL) in 2009. EPA placed the Site on the NPL on March 3, 2010. Placing a Site on the NPL allows EPA to fund and implement remedial actions at the Site. CERCLA also authorizes EPA to recover funds it expends on such sites from responsible parties.

Enclosure 2

SITE MAP

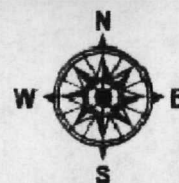


Figure 2
Site Aerial Map



Chemetco Superfund Site, Hartford, Illinois

Seagull Environmental Technologies, Inc.



Source: U.S. Geological Survey

Enclosure 3

DESCRIPTION OF LEGAL AUTHORITY

The federal Superfund law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601, *et seq.*, (commonly referred to as CERCLA or Superfund) gives EPA the authority to, among other things: 1) assess contaminated sites, 2) determine the threats to human health and the environment posed by each site; and 3) clean up those sites.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

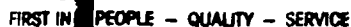
- A. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility, or transported to a vessel or facility;
- B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility; and
- C. The ability to pay the costs of the clean-up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA. This Section also authorizes an enforcement action with similar penalties if the recipient of the Request does not respond and does not justify the failure to respond. Other statutory provisions (18 U.S.C. § 1001) authorize separate penalties if the responses contain false, fictitious or fraudulent statements. The EPA has the authority to use the information requested in this Information Request in an administrative, civil or criminal action.

Enclosure 4

SITE RECORDS

7



-4534

91592

Agmet Metals

DATE 8/2/01

[illegible]

Carrier's No. _____

Date 10-20-91

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Destination HARDFORD State IL. Zip Code _____ Delivery Address ★ _____

Route _____ (* To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

Delivering Carrier Sirumaliam Alibhulle Car or Vehicle Initials 1357 No. 531446

2890	5345	71800
TARC		34140
NET		37660

AIDS NO. 27

8	2	0
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Charging Advancement

Agent or Cashier

Per _____
(The signature here acknowledges only the amounts perpaid.)

♦ Shipper's imprint in lieu of stamp, not a part of Bill of Lading approved by the Interstate Commerce Commission.

Transportation by Rail: Regulated Notations
(Use space below.)

ON BEHALF OF AGMET METALS, INC

SIGNATURE:

TITLE Supper

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:

EMERGENCY RESPONSE PHONE NO.
P-CHEM 1-800-424-5571

Pa

Shipper, Per

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Permanent post office address of shipper

ITEM #FBLH3
Grayarc, P.O. Box 2944, Hartford, CT 06104
©EGI, 1993

Enclosure 5

INSTRUCTIONS

1. Answer each of the questions in this Information Request separately.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all persons and contributing sources of information.
4. Although the EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or misrepresentations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes the EPA to pursue penalties for failure to comply with that Section, or for failure to respond adequately to requests for submissions of required information.
5. You must supplement your response to EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA as soon as possible.
6. For any document submitted in response to a question, indicate the number of the question to which it responds.
7. You must respond to each question based upon all information and documents in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of source.
8. Your response must be accompanied by the following statement, or one that is substantially equivalent:

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. The individual who prepared the response or the responsible corporate official acting on behalf of the corporation must sign and date the statement, affidavit, or certification. Include the corporate official's full title.

9. If any of the requested documents have been transferred to others or have otherwise been disposed of, identify each document, the person to whom it was transferred, describe the circumstances surrounding the transfer or disposition, and state the date of the transfer or disposition.
10. All requested information must be provided notwithstanding its possible characterization as confidential information or trade secrets. If desired, you may assert a business confidentiality claim by means of the procedures described in Enclosure 9.

Enclosure 6

DEFINITIONS

The term ***any***, as in ***any documents*** for example, shall mean "any and all."

The terms ***document*** and ***documents*** shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any computer disk, any information stored on a computer hard drive or memory tape or other type of memory generally associated with computers and data processing; and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.

The term ***Chemetco*** means both the Hartford Site and the warehouses owned or operated by Chemetco listed in Enclosure 8.

The term ***hazardous material*** shall mean any hazardous substances, pollutants or contaminants, and hazardous wastes, as defined below.

The terms ***hazardous substance*** shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.

The term ***hazardous waste*** shall have the same definition as that contained in Subsection 1004(5) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6903(5), and 40 C.F.R. Part 261.

The term ***identify*** means, with respect to a natural person, to set forth the person's full name, present or last known business address, and business telephone number; present or last known home address, and home telephone number; and present or last known job title, position, or business.

The term ***identify*** means, with respect to a corporation, partnership, business, trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

The term ***identify*** means, with respect to a document, to provide its customary business

description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter. The term material shall mean any substance.

The term **identify** means, with respect to a piece of real property or property interest, to provide the legal description which appears in the county property records office, or in the equivalent office which records real property transactions for the area which includes the real property in question.

The terms **includes**, or **including** shall not be construed as words of limitation; that is, they shall be construed such that the phrases "without limitation" or "but not limited to" are implied, unless such phrases are already in place. For example, "including x, y, and z" would be construed as "including without limitation x, y, and z" or as "including, but not limited to, x, y and z," but the phrase "including without limitation x, y and z" would be construed as it reads.

The term **material** or **materials** shall mean any objects, goods, substances, or matter of any kind, including scrap metal, batteries, scrap material, and electrical equipment, together with liquid or wastes contained therein.

The term **person** as used herein includes in the plural as well as the singular any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise. See Subsection 101(21) of CERCLA, 42 U.S.C. § 9601(21).

The terms **pollutant** or **contaminant** shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.

The term **property interest** means any interest in property including but not limited to, any ownership interest, an easement, a deed, a lease, a mining claim, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.

The term **recyclable material** has the same definition as contained in 42 U.S.C. § 9627, and means scrap paper, scrap plastic, scrap glass, scrap textiles, scrap rubber (other than whole tires), scrap metal, or spent lead-acid, spent nickel-cadmium, and other spent batteries, as well as minor amounts of material incident to or adhering to the scrap material as a result of its normal and customary use prior to becoming scrap; except that such term shall not include:

- (a) shipping containers of a capacity from 30 liters to 3,000 liters, whether intact or not, having any hazardous substance (but not metal bits and pieces or hazardous substance that form an integral part of the container) contained in or adhering thereto; or

(b) any item of material that contained polychlorinated biphenyls at a concentration in excess of 50 parts per million or any new standard promulgated pursuant to applicable federal laws.

The term ***release*** shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant.

The term ***scrap metal*** shall have the same definition contained in 42 U.S.C. § 9627, and shall mean bits and pieces of metal parts (e.g., bars, turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering (e.g., radiators, scrap automobiles, railroad box cars), which when worn or superfluous can be recycled, except for scrap metals that the EPA Administrator excludes from this definition by regulation.

The ***Site*** referenced in these documents shall mean the former Chemetco facility located on Illinois Route 3 in Hartford, Madison County, Illinois (See Enclosure 2). The facility address is 3754 Chemetco Lane, Hartford, Illinois, 62048.

The terms ***you*** or ***your company*** or ***Respondent*** refer not only to the addressee of this letter as it is currently named and constituted, but also to all predecessors and successors in interest of the addressee, and all subsidiaries, divisions, affiliates, and branches of the addressee and its predecessors and successors.

All terms not defined herein will have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300, or 40 C.F.R. Parts 260-280, in which case, the statutory or regulatory definitions will apply.

The relevant time frame to which the attached Request refers is 1970 to the present.

Enclosure 7

INFORMATION REQUEST

1. Provide the following information about your company ("Respondent"):
 - (a) The complete and correct legal name of your company.
 - (b) The name(s) and address(es) of the President and the Chairman of the Board, or other presiding officer of the company.
 - (c) The state of incorporation of the company and the company's agents for service.
 - (d) The name(s) of all subsidiaries, affiliates, or parent companies to your company.
 - (e) The state of incorporation and agents for service of process in the state of incorporation.
 - (f) The status of all subsidiaries, affiliates, or parent companies to your company.
2. Describe and provide any documents related to your company's business activities which resulted in sending material to Chemetco.
3. Describe and provide any documents related to your company's role at the Site, including what duties/involvement your company had at the Site.
4. If the nature or size of Respondent's activities in relation to Chemetco changed over time, describe those changes and the dates they occurred.
5. For each type of waste or material used in Respondent's operations, describe and provide documents relating to Respondent's contracts, agreements, or other arrangements for its disposal, treatment, trading, or recycling with Chemetco, including but not limited to whether Respondent controlled where waste sent to Chemetco warehouses was ultimately processed/recycled.
6. If not already provided, specify the dates and circumstances when Respondent's waste or material was taken to the Site, and identify the companies or individuals who brought Respondent's waste/material to the Site. Provide any documents which support or memorialize your response.

7. Were transactions between your company and Chemetco and specifically the Site: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?
8. Did your company have any influence over waste disposal or recycling activities at the Site? If so, how?
9. Was any shipment of material sent to the Site by Respondent ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.
10. Describe in detail the types of material that you sent for recycling, processing, or disposal at the Site. In your response, please also give the generic name of each type of materials shipped to the Site [e.g., scrap metal (including scrap automobiles), batteries, electronics, scrap paper, scrap plastic or scrap textile, etc.].
 - (a) Identify whether the materials were delivered directly to the Site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.
 - (b) State whether any of the material was ever tested by your company and if so, whether the substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. § 261, Subpart C.
 - (c) Describe what was done to materials once they were brought to the Site, including any further processing of the materials.
 - (d) Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the materials you sent to the Site.
 - (e) List the years in which your company sent materials to Chemetco and/or its broker(s) for recycling, processing, or disposal.

Questions and Requests for Documents Related to Scrap Metal

11. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
 - (a) Did a market exist for the scrap metal listed in your response to No. 10 above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of the commercial specification grade (e.g., Institute of Scrap Recycling

Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).

- (b) What commercial specification grade did the scrap metal listed in your response to question No. 10 meet? Identify/list the commercial specification grades that each scrap metal identified in No. 9 met.
 - (c) At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question No. 10? Did this include burning as fuel, or for energy recovery, or incineration?
 - (d) After sale, transfer, delivery, recycling, or disposal, what portion of the scrap metal listed in your response to question No. 10 was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - (e) Could the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - (f) Could any products made from the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
 - (g) Did your company melt the scrap metal listed in your response to question No. 10 before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal.
 - (h) Describe the source of or the process that produced the materials sent to the Site.
12. Did any of the scrap material sent to the Site contain other material(s) incident to or adhering to the scrap? If so, describe in detail.
13. Did any of the material sent to the Site contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at the Site, after being received at the Site, or was the wire not stripped?
14. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.

15. Describe all efforts (i.e., Site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question No. 10.

Questions and Request for Documents Related to Electrical and Electronic Equipment

16. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers, monitors, cables, circuit boards, or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:
- (a) List an estimated number of shipments of electrical and electronic equipment your company sent to the Site on an annual basis and list the years. In this list, include the type and quantity, volume and weight of electrical and electronic equipment sent;
 - (b) At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 15(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?
17. With respect to waste or materials sent to the Site, at the time of the transactions, specify the measures you took to determine the actual means of treatment, disposal, recycling, or other uses of the material. Provide information you had and any documents relating to the treatment, recycling and disposal practices of Chemetco at the Site. What assurances, if any, were you given by the owner/operator of the Site regarding the proper handling and ultimate disposition of the materials you sent there, as well as its compliance with applicable environmental laws? Include in your response any correspondence to and from Chemetco relating to this topic and dates the measures were taken or assurances were given.
18. What efforts and when, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering disposing of, trading, or arranging for the treatment, recycling, or disposal of any materials?
19. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. § 9627, sent to the Chemetco Site.
20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under Resource Conservation and Recovery Act (RCRA).

21. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.
22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 *et seq.*, (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 *et seq.*, (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 *et seq.*
23. Identify the federal and state offices to which such information was sent. State the years during which such information was sent/filed.
24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
25. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained. If the records were destroyed, provide us with the following:
 - (a) the document retention policy between 1970 and 2001;
 - (b) a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;
 - (c) a description of the type of information that would have been contained in the documents;
 - (d) the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these documents; and the person(s) who had and/or still may have the originals or copies of these documents; and
 - (e) the names and most current address of any person(s) who may possess documents relevant to this inquiry.

26. Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.

Enclosure 8

List of Chemetco Warehouses

ID	NAME	STREET	CITY	PHONE	NOTES
59	CONCORDE ADJUSTMENT W/H	FOR ADMINISTRATIVE	PURPOSES ONLY		USED FOR INVENTORY ADJUSTMENTS ONLY
69	CONCORDE ASARCO WAREHOUSE	P.O. BOX 30200	AMARILLO, TX	212-510-2143	A FORMER "ADMINISTRATIVE" W/H ON THE SYSTEM
2	CONCORDE AMARILLO WAREHOUSE	1209 NW FIRST STREET	AMARILLO, TX 79120		YARD IS CLOSED
5	CONCORDE ANNISTON WAREHOUSE	HIGHWAY 78 EAST	ANNISTON, AL 36202	205-831-0310	FOR CONCORDE RADIATOR PROCESSING AT TRSI-ANNISTON HQ
4	MULTI - MULTI-ANNISTON H.Q.	1610 FRANK AKERS ROAD	ANNISTON, AL 36201	205-831-8300	MARKED INACTIVE 11/2/93
39	MULTI - MULTIMETCO, INC. H.Q.	1610 FRANK AKERS ROAD	ANNISTON, AL 36201	205-831-8300	FOR MULTIMETCO'S W/H SYSTEM ON HARTFORD'S COMPUTER
7	CHEMETCO ATLANTA WAREHOUSE	5473 TULANE DRIVE	ATLANTA, GA. 30336	404-696-0936	CLOSED 6/93, REOPENED 1/95
8	CONCORDE AUGUSTA WAREHOUSE	1890 OLD SAVANNAH,BLDG 6	AUGUSTA, GA 30901	404-724-4077	CLOSED IN FEBRUARY 1991
9	CONCORDE BALTIMORE WAREHOUSE	240 S. KRESSON ST.	BALTIMORE, MD. 21224	301-563-6601	CLOSED IN AUGUST 1991
11	CONCORDE BATON ROUGE WAREHOUSE	887 JOPLIN AVE.	BATON ROUGE, LA. 70802	504-346-8447	CLOSED IN MARCH 1991
70	CHEMETCO BOSTON WAREHOUSE		BOSTON, MA		CHECK INFORMATION COMMERCE BANK HANNIBAL, MO
18	CONCORDE CHARLESTON WAREHOUSE	995 MORRISON DR, SUITE D	CHARLESTON, SC. 29403	803-722-4057	CLOSED IN JULY 1991
14	CHEMETCO CHARLOTTE WAREHOUSE	700 TUCKASEEGEE ROAD	CHARLOTTE, NC. 28206	704-377-6835	LARRY HUTCHINS, MGR.
13	CHEMETCO CHICAGO WAREHOUSE	3200 SOUTH ST. LOUIS	CHICAGO, IL 60623	312-927-8473	JUNIOR AVALOS-MGR, LUPE MARTINEZ-ADM, RAMBO-FRM
15	CHEMETCO CLEVELAND WAREHOUSE	1302 EAST 40TH ST	CLEVELAND, OH. 44114	216-426-8808	REOPENED 5/97
31	CHEMETCO LOS ANGELES WAREHOUSE	2136 GARFIELD	COMMERCE CITY, CA 90045	213 887-7175	MGR. CONNIE MENDEZ, ADM.
33	MULTIMET MEMPHIS MM WAREHOUSE	1495 HIGHWAY 51 NORTH	COVINGTON, TN. 38019	901-476-2102	NEW MULTIMETCO WAREHOUSE 6/15/94
19	CHEMETCO DALLAS WAREHOUSE	4647 LESTON, SUITE 601	DALLAS, TX. 75247	214-637-6060	VERNON VOTAVA, MGR.
21	CHEMETCO DETROIT WAREHOUSE	10400 SOUTHERN AVE	DEARBORN, MI 48126	313-582-6950	RICK FOWLER, MGR. SHERYL TRAUDT, ADM.
22	CONCORDE DENVER WAREHOUSE	4185 GARFIELD ST, UNIT 8	DENVER, CO. 80216	303-320-6568	CLOSED 6/93
48	CONCORDE EL PASO WAREHOUSE	421 FREDERICK	EL PASO, TX 79905	915-775-2544	CLOSED 6/93
1	CHEMETCO METALS DE MEXICO	AV DE LAS INDUSTRIAS400A	ESCOBEDO, N L. MEXICO	528-384-8050	
23	CONCORDE FORT WAYNE WAREHOUSE	6134 MOELLER ROAD	FORT WAYNE, IN. 46806	219-749-1106	CLOSED IN JULY 1991
17	CHEMETCO TRANSFORMIT WAREHOUSE	2720 MISSOURI AVE.	GRANITE CITY, IL 62040	618-452-5612	
24	MULTI - MULTI-GRANITE CITY W.H.	2720 MISSOURI AVE.	GRANITE CITY, IL 62040	618-452-5600	NEVER USED ON WAREHOUSE SYSTEM
25	CONCORDE GREENSBORO WAREHOUSE	1810 SULLIVAN ST	GREENSBORO, NC. 27405	919-271-9006	CLOSED IN JULY 1991
16	CHEMETCO CHEMETCO - HARTFORD HQ	ROUTE 3 & OLDENBERG ROAD	HARTFORD, IL 62048	800-444-5564	ADM. OFFICE FOR ALL CHEMETCO WAREHOUSES
66	CONCORDE TRADING WAREHOUSE	ROUTE 3 OLDENBURG ROAD	HARTFORD, IL 62048	618-254-0190	ADMIN./ACCT. USE ONLY - CONTACT DEBBIE STUART/TRACY
20	CHEMETCO HIDALGO WAREHOUSE	313 PRODUCE ROAD	HIDALGO, TX 78557	959-843-7002	
26	CHEMETCO HOUSTON WAREHOUSE	415 N. WAYSIDE	HOUSTON, TX. 77020	713-678-7183	LYNN MABRY, MGR., WILENA CATO, ADM.
64	MULTI - MULTI-HOUSTON W.H.	2601 HOLMES ROAD	HOUSTON, TX. 77051	713-797-9592	CLOSED IN SEPTEMBER 1991
52	CONCORDE GRAND RAPIDS WAREHOUSE	5030 40TH AVE., BOX 13	HUDSONVILLE, MI. 49426	616-669-7060	CLOSED IN JULY 1991
27	CONCORDE INDIANAPOLIS WAREHOUSE	1670 WALES AVENUE BLD 18	INDIANAPOLIS, IN. 46218	317-353-6862	CLOSED 6/93
38	CONCORDE MISS WAREHOUSE	304 BEATTY	JACKSON, MS 39204	601-352-5027	BECAME PART OF TRSI IN JUNE 1991
29	CONCORDE JACKSON TN WAREHOUSE	540 MOBILE	JACKSON, TN. 38301	901-424-4596	CLOSED IN JANUARY 1991
28	CONCORDE JACKSONVILLE WAREHOUSE	617 N. LANE AVE.	JACKSONVILLE, FL 32205	904-786-5309	CLOSED IN JUNE 1991
45	CONCORDE NEW ORLEANS WAREHOUSE	600 ST. GEORGE AVE	JEFFERSON, LA. 70121	504-733-9546	HERB SONGY, JR., MGR. ROBIN HENSEN, ADM
30	CONCORDE KANSAS CITY WAREHOUSE	1405 WOODSWETHER ROAD	KANSAS CITY, MO. 64151	816-842-7510	CLOSED 6/93
12	CONCORDE BUFFALO WAREHOUSE	1120 MILITARY ROAD	KENMORE, NY. 14217	716-873-2857	RONALD FAULKNER, W/H MANAGER
43	CONCORDE NASHVILLE WAREHOUSE	401 SAND HILL ROAD	LAVERGNE, TN. 37086	615-793-3650	JOHN FORGY, MGR. LISA TUTTLE, ADM.
32	CONCORDE LITTLE ROCK WAREHOUSE	3600 E 9TH ST.	LITTLE ROCK, AR. 72202	501-376-9122	CLOSED IN JANUARY 1991
72	CHEMETCO LOS ANGELES WAREHOUSE		LOS ANGELES, CA		CHECK INFORMATION COMMERCE BANK HANNIBAL, MO
34	CONCORDE MERIDIAN WAREHOUSE	1601 FRONT STREET	MERIDIAN, MS. 39302	601-485-8688	BECAME PART OF TRSI IN JUNE 1991

ID	NAME	STREET	CITY	PHONE	NOTES
35	CHEMETCO MIAMI WAREHOUSE	10050 NW 116TH WAY	MIAMI, FL. 33178	305-887-2307	TIM ENGLER, MGR. MARURA CASANOVAS, ADM.
65	CHEMETCO TORONTO WARHOUSE	1565 BRITANNIA EAST	MISSISSAGUA, ONT L4W 3C6	416-670-0771	STEWERT LOWRY, MANAGER
40	CONCORDE MOBILE WAREHOUSE	701 N. JOACHIM	MOBILE, AL. 36603	205-432-7604	BECAME PART OF TRSI IN JUNE 1991
42	CONCORDE MONTGOMERY WAREHOUSE	937 MOBILE ROAD	MONTGOMERY, AL 36108	205-834-4148	CLOSED IN MAY 1991
3	CONCORDE ANNISTON (CORES)	INTERSTATE 20/MUNFORD EX	MUNFORD, AL 36201		BECAME PART OF TRSI IN JUNE 1991
71	CHEMETCO NEWARK WAREHOUSE		NEWARK, NJ		CHECK INFORMATION COMMERCE BANK HANNIBAL, MO
49	CHEMETCO PHILADELPHIA WAREHOUSE	9270 COMMERCE HWY	PENNSAUKEN, NJ. 08110	609-665-0909	BOB MAGUIRE, MGR VONDA WILLIAMS, ADM.
62	CHEMETCO PHOENIX WAREHOUSE	34 N 45 AVE, SUITE E&F	PHOENIX, AZ 85043	602-272-7778	
50	CHEMETCO PITTSBURGH WAREHOUSE	28 MCCANDLESS AVENUE	PITTSBURGH, PA. 15201	412-781-8802	TOM BOES, MGR JOYCE PAWLOWSKI, ADM.
51	MULTI - MULTI-POTTSTOWN W.H.	800 INDUSTRIAL HIGHWAY	POTTSTOWN, PA. 19464	215-326-2042	CLOSED IN SEPTEMBER 1991
37	CONCORDE MINNEAPOLIS WAREHOUSE	1979 WEST COUNTY ROAD C	ROSEVILLE, MN. 55113	612-633-6706	CLOSED 6/93
53	CONCORDE SAN ANTONIO WAREHOUSE	1435 SHERMAN STREET	SAN ANTONIO, TX 78202	512-222-1255	CLOSED 6/93
46	CONCORDE OAKLAND WAREHOUSE	3012 B. ALVARADO ST.	SAN LEANDRO, CA. 94577	510-483-9364	CLOSED 6/93
54	CONCORDE SAVANNAH WAREHOUSE	9 TELFARE PLACE, SUITE 6	SAVANNAH, GA. 31401	912-236-1887	CLOSED IN JUNE 1991
55	CONCORDE SEATTLE WAREHOUSE	432 S. CLOVERDALE	SEATTLE, WA. 98108	206-768-0722	CLOSED 6/93
56	CONCORDE SHREVEPORT WAREHOUSE	910 W. 62 STREET	SHREVEPORT, LA. 71148	318-861-7653	NO LONGER A CONCORDE YARD 6/91, NOT PART OF TRSI
57	CONCORDE SIKESTON WAREHOUSE	ROUTE 2, HH HWY	SIKESTON, MO. 63801	314-471-7788	NO LONGER A CONCORDE YARD AS OF MARCH 1991
44	CHEMETCO NEWARK WAREHOUSE	48 3RD STREET	SOUTH KEARNY, NJ. 07032	201-578-8989	HECTOR RAMCHARRAN, MGR. MARIE MACKIEWICZ, ADM.
47	CONCORDE SPRINGFIELD WAREHOUSE	2610 W. KARNEY	SPRINGFIELD, MO. 65803	417-862-1881	CLOSED IN AUGUST 1991
58	CONCORDE MULTI-MIDCO, ST. LOUIS	700 S. SPRING ST.	ST. LOUIS	314-776-5600	CUTTING CENTER FOR CONVERTER PROCESSING
36	MIDCO MIDCO RECEIVING DEPARTMENT	700 S SPRING AVE.	ST. LOUIS, MO. 63110	314-776-5600	LOGON ALLOWS MIDCO TO RECEIVE LOTS INTO CTC SYSTEM
61	CHEMETCO ST. LOUIS WAREHOUSE	5801 HALL STREET	ST. LOUIS, MO 63147	314-389-3771	
60	MULTI - MULTI-STOCKTON W.H.	2353 STAGECOACH ROAD	STOCKTON, CA. 95205	209-948-2721	CLOSED NOVEMBER 16, 1990
63	CONCORDE TAMPA WAREHOUSE	4735 DISTRIBUTION DR.	TAMPA, FL. 33605	813-248-2440	CLOSED 6/93
67	CONCORDE TULSA WAREHOUSE	11915 EAST 51ST STREET	TULSA, OK. 74145	918-252-1898	CLOSED IN MARCH 1991
41	CHEMETCO MONTREAL WAREHOUSE	10381 RENAUE LAPOINTE	VILLED'ANJOU, MONTREAL, QU	514-493-3883	ANTONIO IERICI-MGR CANDY GAGNON-ADM (NOT U.S. SYS)
10	CHEMETCO BOSTON WAREHOUSE	36 RENMOR AVE.	WALPOLE, MA. 02081	508-850-9000	REOPENED DEC 98
68	CONCORDE MILWAUKEE WAREHOUSE	11111 W. MITCHELL ST.	WEST ALLIS, WI. 53214	414-771-0825	CLOSED IN JULY 1991
6	CONCORDE WYNNE WAREHOUSE	HIGHWAY 64 WEST	WYNNE, AR 72396	501-238-9535	CLOSED IN DECEMBER 1990

Enclosure 9

CONFIDENTIAL BUSINESS INFORMATION

You may consider some of the information confidential that the U.S. Environmental Protection Agency (EPA or Agency) is requesting. You cannot withhold information or records upon that basis. The Regulations at 40 C.F.R. Part 2, Section 200 *et seq.*, require that the EPA affords you the opportunity to substantiate your claim of confidentiality before the Agency makes a final determination on the confidentiality of the information.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. (See 41 Federal Register 36902 *et seq.* (September 1, 1976); 43 Federal Register 4000 *et seq.*, (December 18, 1985).) If no such claim accompanies the information when the EPA receives it, the information may be made available to the public by the Agency without further notice to you. Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of Comprehensive Environmental Response Compensation Liability Act (CERCLA); because as stated in Section 104(e)(7) (ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish the EPA to treat the information or record as "confidential," you must advise the EPA of that fact by following the procedures described below, including the requirement for supporting your claim of confidentiality. To assert a claim of confidentiality, you must specify which portions of the information or documents you consider confidential. Please identify the information or document that you consider confidential by page, paragraph, and sentence. You must make a separate assertion of confidentiality for each response and each document that you consider confidential. Submit the portion of the response that you consider confidential in a separate, sealed envelope. Mark the envelope "confidential," and identify the number of the question to which it is the response.

For each assertion of confidentiality, identify:

1. The period of time for which you request that the Agency consider the information confidential, e.g., until a specific date or until the occurrence of a specific event;
2. The measures that you have taken to guard against disclosure of the information to others;
3. The extent to which the information has already been disclosed to others and the precautions that you have taken to ensure that no further disclosure occurs;
4. Whether the EPA or other federal agency has made pertinent determination on the confidentiality of the information or document. If an agency has made such a determination, enclose a copy of that determination;

5. Whether disclosure of the information or document would be likely to result in substantial harmful effects to your competitive position. If you believe such harm would result from any disclosure, explain the nature of the harmful effects, why the harm should be viewed as substantial, and the causal relationship between disclosure and the harmful effect. Include a description of how a competitor would use the information; and
6. Whether you assert that the information is voluntarily submitted as defined by 40 C.F.R. § 2.201(i). If you make this assertion, explain how the disclosure would tend to lessen the ability of the EPA to obtain similar information in the future; and
7. Any other information that you deem relevant to a determination of confidentiality.

Please note that pursuant to 40 C.F.R. § 2.208(e), the burden of substantiating confidentiality rests with you. The EPA will give little or no weight to conclusory allegations. If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that the EPA may maintain their confidentiality pursuant to 40 C.F.R. § 2.205(c). If you do not identify this information and documents as "confidential," your comments will be available to the public without further notice to you.